

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MARYLAND
Greenbelt

IN RE:

JONATHAN ALVIN ADAMS

Debtor(s) Chapter 13
Case No. 19-18043

OBJECTION OF WELLS FARGO BANK, N.A.
TO PROPOSED CHAPTER 13 PLAN AND
CONFIRMATION THEREOF

Wells Fargo Bank, N.A. and its assignees and/or successors in interest, a secured creditor in the above-entitled Bankruptcy proceeding, hereby submits the following objections to the Confirmation of the Chapter 13 Plan proposed by the Debtor(s):

1. This objecting secured creditor is the beneficiary of a trust deed on property commonly known as 14003 Mary Bowie Pkwy, Upper Marlboro, MD 20774; the promissory note and deed of trust will be attached to the proof of claim when it is filed by the secured creditor.
2. The debtor(s) are due a total estimated pre-petition arrears of \$26,607.50.
3. The proposed Chapter 13 plan does not provide this objecting Secured Creditor with adequate protection or adequate security, according to Sections 362 and 1325 (a) of the Code.
4. The plan does not propose to pay the Secured Creditor's entire claim in that the arrears are listed in the amount of \$13,817.75 and this Creditor's claim is estimated to be \$26,607.50.

CONCLUSION

Any Chapter 13 Plan proposed by the Debtor(s) must provide for and eliminate the objections specified above in order to be feasible and to provide adequate protection to this objecting secured creditor. It is respectfully requested that confirmation of the Chapter 13 Plan as proposed by the Debtor(s) be denied.

WHEREFORE, secured creditor prays as follows:

1. That confirmation of the proposed Chapter 13 Plan be denied.
2. For attorney's fees and costs incurred herein.
3. For dismissal of the Chapter 13 proceeding.
4. For such other relief as this Court deems proper.

Dated: June 27, 2019

Respectfully submitted
Wells Fargo Bank, N.A.

By Counsel:

/s/ Malcolm B. Savage, III
William M. Savage, Esquire
Kristine D. Brown, Esquire
Thomas J. Gartner, Esquire
Gregory N. Britto, Esquire
Renee Dyson, Esquire
Malcolm B. Savage, III, Esquire
Nicole Lipinski, Esquire
Shapiro & Brown, LLP
10021 Balls Ford Road, Suite 200
Manassas, Virginia 20109
(703) 449-5800
ecf@logs.com

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of June, 2019 the following person(s) were served a copy of the foregoing Objection to the Chapter 13 Plan in the manner described below:

Via CM/ECF Electronic Notice

Nancy Spencer Grigsby
185 Admiral Cochrane Dr.
Suite 240
Annapolis, MD 21401

Trustee

Richard B. Rosenblatt
The Law Offices of Richard B. Rosenblatt
30 Courthouse Square Ste. 302
Rockville, MD 20850

Debtors' Attorney

Via First Class Mail, Postage Prepaid:

JONATHAN ALVIN ADAMS
14003 MARY BOWIE PKWY
UPPER MARLBORO, MD 20774

Debtor(s)

/s/ Malcolm B. Savage, III
William M. Savage, Esquire
Kristine D. Brown, Esquire
Thomas J. Gartner, Esquire
Gregory N. Britto, Esquire
Renee Dyson, Esquire
Malcolm B. Savage, III, Esquire
Nicole Lipinski, Esquire

19-281522